REMARKS/ARGUMENTS

The Office Action mailed August 20, 2008, has been received and the Examiner's comments carefully reviewed. Claims 1-19 were rejected. Claims 1, 4-9, 11, 13-14, 16, and 18 have been amended. Claims 2-3, 10, and 17 are canceled. For at least the following reasons, Applicants respectfully submit that the pending claims are in condition for allowance.

Interview October 14, 2008

Applicants thank the Examiner for the courtesy of the telephone conference on October 14, 2008. The independent claims as amended were discussed with regard to the cited references. Specifically, that O'Reilly does not teach representing a feature that starts within an element and ends outside of the element. Additionally, O'Reilly does not teach use of an attribute set to a reference value that indicates an association between a start feature tag and end feature tag. The Examiner indicated that the proposed amendments would move prosecution in the right direction and that more detailed review of the reference would be required.

Claim Rejections

Claims 1-19 were rejected under 35 U.S.C. 102(b) as being anticipated by O'Reilly, "HTML & XHTML The Definitive Guide", Fourth Edition, Copyright 2000 (hereinafter "O'Reilly"). Applicants respectfully disagree but have amended the claims to more clearly define the invention.

As amended, Claim 1 recites, in part, "determining a start feature tag location for a non-structured feature; wherein the non-structured feature spans a range that begins at a location that is after a start tag of an outer element and before an end tag of the outer element; determining an

end feature tag location for the non-structured feature; wherein the non-structured feature spans

the range that that ends at a location that is after the end tag of the outer element; . . . wherein the

start feature tag does not include other elements and the start feature tag includes a start identifier

attribute; . . . wherein the end feature tag does not include other elements and the end feature tag

includes an end identifier attribute; . . . determining a reference value, the reference value

indicating an association between the start feature tag and the end feature tag; setting the start

identifier attribute to the reference value; and setting the end identifier attribute to the reference

value." In contrast, O'Reilly does not disclose, teach or suggest how a "non-structured feature"

can be represented when the feature starts inside of an "outer element" and ends outside of the

"outer element." While still maintaining a well formed document, O'Reilly also does not teach

using a reference value to associate two tags that represent a non-structured feature.

For example, O'Reilly discloses that "**[i]n this chapter,** however, we talk about the

minority: **where the HTML 4.01 standard and the XHTML DTD differ.**" O'Reilly, Chapter

16.3 (emphasis added). O'Reilly also discloses that "your efforts to master XHTML will be

rewarded with documents that are well-formed and a sense of satisfaction from **playing by the**

new rules." (O'Reilly, Chapter 16.3) (emphasis added). O'Reilly also discloses some "rules" for

creating well formed XHTML. See e.g. O'Reilly, "16.3.1 Correctly Nested Elements. . . **[o]ne**

requirement of a well-formed XHTML document **is that its elements are nested correctly.**"

In section 16.3.1, O'Reilly states "**[i]f one element is within another, the end tag of the inner**

element must appear before the end tag of the outer element."

O'Reilly does not teach "determining a start feature tag location for a non-structured feature; wherein the non-structured feature spans a range that begins at a location that is after a start tag of an outer element and before an end tag of the outer element." Similarly, O'Reilly does not teach "determining an end feature tag location for the non-structured feature; wherein the non-structured feature spans the range that ends at a location that is after the end tag of the outer element." In contrast, O'Reilly teaches that an inner element must be closed before an outer element is closed. (O'Reilly, section 16.3.1, states "[i]f one element is within another, the end tag of the inner element must appear before the end tag of the outer element.")

The Office Action states that "[t]he example allows for the creation of empty tags in a markup language document to mark empty table cells." (Office Action, pg. 3:5-6.) O'Reilly describes a way to represent an empty table cell ("<td />"). (See O'Reilly, section 16.3.3). However, in O'Reilly, the empty table cell does not start within an outer element and end after an outer element. The empty table cell disclosed by O'Reilly starts and ends within the same outer element. In fact, O'Reilly's table cell can only start and end within the same outer element because, according to the teachings of O'Reilly, "**[i]f one element is within another, the end tag of the inner element must appear before the end tag of the outer element.**" O'Reilly, section 16.3.1.

In addition, O'Reilly does not teach associating two tags together using an attribute. O'Reilly may teach use of an attribute, however, O'Reilly does not teach an association of two tags using an attribute value. For example, O'Reilly teaches a table tag that includes a "rows" attribute. O'Reilly, Section 16.3.5. The "rows" attribute is used to set the number of rows in a table. The "rows" attribute does not associate the table tag with another tag.

It should also be noted that O'Reilly teaches away from the proposition that it may even be possible to represent non-structured features that start in an outer element and end after the outer element. Instead, O'Reilly focuses towards simply obeying the rules. O'Reilly states "[i]n W3C parlance, that means your documents **must be impeccably well-formed.**" (O'Reilly, Section 16.3 (emphasis added, internal quotations omitted)). O'Reilly further states "[o]ne **requirement** of a well-formed XHTML document is that its **elements are nested correctly. . . [i]f one element is within another, the end tag of the inner element must appear before the end tag of the outer element.**" (O'Reilly, Section 16.3.1 (emphasis added)). O'Reilly also states "[e]very tag that contains other tags or content **must have a** corresponding end tag present, **correctly nested within the XHTML document. A missing end tag is an error** and renders the **document non-compliant.**" (O'Reilly, Section 16.3.2 (emphasis added)). While O'Reilly makes clear that XHTML must be **"impeccably well-formed"** (O'Reilly, section 16.3), what happens if a "non-structured feature" that starts within an "outer element" and ends after the "outer element" has ended needs to be represented? O'Reilly does not teach a method for representing a "non-structured feature" that starts within an outer element and ends after an outer element has ended.

Since O'Reilly does not teach "determining a start feature tag location for a non-structured feature; wherein the non-structured feature spans a range that begins at a location that is after a start tag of an outer element and before an end tag of the outer element; determining an end feature tag location for the non-structured feature; wherein the non-structured feature spans the range that ends at a location that is after the end tag of the outer element; . . . wherein the start feature tag does not include other elements and the start feature tag includes a start identifier

attribute; . . . wherein the end feature tag does not include other elements and the end feature tag

includes an end identifier attribute; . . . determining a reference value, the reference value

indicating an association between the start feature tag and the end feature tag; setting the start

identifier attribute to a reference value; and setting the end identifier attribute to the reference

value", Claim 1 is proposed to be allowable. Claims 2 and 3 are canceled; claims 4-8 are

proposed to be allowable as they depend from a valid base claim.

Regarding dependent Claim 8, the Office Action states "[t]he language found within

dependent claim 8 states may be used for at least one function, etc. The language fails to provide

a[n] definitive step and as such, the function selected from the group may never be selected."

(Office Action, pg. 4:3-5). Claim 8 has been amended to recite "wherein the start feature tag and

the end feature tag are used . . . ." Dependent claim 8 is proposed to be allowable.

As amended, Claim 9 recites, in part "determining locations for a start feature tag and an

end feature tag; wherein a non-structured feature spans a range beginning at a location associated

with the start feature tag location and ending at a location associated with the end feature tag

location; wherein the start feature tag location is within a first element and outside a second

element while the end feature tag is located within a second element and outside the first element

while adhering to a well formed ML rule; and placing the start feature tag and the end feature tag

at the determined locations, wherein at least one of the start feature tag and the end feature tag

includes an attribute identifier that indicates an association between the start feature tag and the

end feature tag." For at least the reasons presented above, Claim 9 is proposed to be allowable.

Claim 10 is canceled, claims 11-15 are proposed to be allowable as they depend from a valid base claim.

As amended, Claim 16 recites in part "determine locations for a start feature tag and an end feature tag; wherein a non-structured feature spans a range beginning at a location associated with the start feature tag location and ends at a location associated with the end feature tag location; wherein the range encompasses multiple other tags in the ML document; and place a start feature tag and an end feature tag at the determined locations, wherein the location of the start feature tag indicates a starting position for a non-structured feature and the location of the end feature tag represents an ending position for the non-structured feature; and wherein the start feature tag and the end feature tag are not located within the same ML element while adhering to a well formed ML rule; and wherein the non-structured feature spans the other tags within the ML document; determine an identifier indicating an association between the start feature tag and the end feature tag; place a start attribute within the start feature tag, the start attribute comprising the identifier; place an end attribute within the end feature tag, the end attribute comprising the identifier; . . . .". For at least the reasons presented above, Claim 16 is proposed to be allowable. Claim 17 is canceled, Claims 18-19 are proposed to be allowable as they depend from a valid base claim.

Conclusion

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application,

the Examiner is requested to contact the undersigned agent for the applicants at the telephone

number provided below.

Respectfully submitted,

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